## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

	x
PRACTICEWORKS, INC., et al.,	) )
Plaintiffs	) Civil No.: JFM 02 CV 1205
- against -	) )
PROFESSIONAL SOFTWARE SOLUTIONS OF ILLINOIS, INC.,	) )
Defendant.	
	<b>Χ</b>
PRACTICEWORKS, INC., et al.,	
Plaintiffs	Civil No.: JFM 02 CV 1206
- against -	
DENTAL MEDICAL AUTOMATION, INC.,	
Detendant. )	<u> </u>

## **STIPULATION**

WHEREAS on July 28, 2003, Defendants and Counter-Plaintiffs Professional Software Solutions of Illinois, Inc. and Dental Medical Automation, Inc. ("Defendants") filed and served their Motion for Leave to File First Amended Counterclaims in the above-captioned actions;

WHEREAS Plaintiffs PracticeWorks, Inc. and SoftDent LLC ("Plaintiffs") have communicated to Defendants Plaintiffs' intention to file a First Amended Complaint; and

WHEREAS Plaintiffs and Defendants have agreed-pending Court approval-to obviate the necessity for motions for leave to amend by consenting to each other's filing of an amended pleading,

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IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the parties to this action that, in the interests of ease management and litigation efficiency:

- 1. On September 29, 2003, Defendants will withdraw their Motion for Leave to File First Amended Counterclaims in the above-captioned actions;
- On September 30, 2003, Plaintiffs will file their First Amended Complaint in compliance with Local Rule 103.6(b) and (c);
- 3. On October 20, 2003, Defendants will file their First Amended Answer and Counterclaims in compliance with Local Rule 103.6(b) and (c);
- 4. Plaintiffs and Defendants expressly reserve the right to challenge the other's amended pleading and further reserve the right to make any dispositive motion as to the amended pleadings by no later than November 20, 2003; and
- Pending the Court's approval, Plaintiffs and Defendants agree that discovery shall be 5. stayed until November 20, unless Plaintiffs and/or Defendants make a dispositive motion as to the amended pleadings by said date pursuant to paragraph 4 hereinabove whereby it is agreed that discovery will be stayed pending the determination of said dispositive motion(s).

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APPROVED this	day of	, 2003:
Judge, United St	ates District	
For the District		